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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RICHARD ZEITLIN, ADVANCED
TELEPHONY CONSULTANTS, MRZ
MANAGEMENT, LLC, DONOR
RELATIONS, LLC, TPFE, INC.,
AMERICAN TECHNOLOGY SERVICES,
COMPLIANCE CONSULTANTS,
CHROME BUILDERS CONSTRUCTION,
INC., and UNIFIED DATA SERVICES,

Plaintiffs,

v.

BANK OF AMERICA, N.A. and JOHN
and JANE DOES 1-100,

Defendants.

Case No. 2:18-cv-01919-RFB-BNW

**JOINT STIPULATION TO EXTEND
DEADLINE TO RESPOND TO
DEFENDANT'S OBJECTION TO
MAGISTRATE JUDGE'S ORDER [ECF
NO. 192]
(Third Request)**

Pursuant to Local Rules IA 6-1, IA 6-2, 7-1, and IB 3-1, Plaintiffs Richard Zeitlin, Advanced Telephony Consultants, MRZ Management, LLC, Donor Relations, LLC, TPFE, Inc., American Technology Services, Compliance Consultants, Chrome Builders Construction, and Unified Data Services, (hereinafter the "Plaintiffs"), and the Defendant Bank of America (hereinafter "BOFA"), by and through their respective attorneys of record, hereby jointly stipulate to extend the briefing schedule for the Plaintiffs to file a response to the Defendant's Objection to the Magistrate Judge's Order. (Docs. 192 and 200.) This is the third stipulation requesting an extension of time to extend the deadline to

respond to the Defendant's Objection. (Doc. 200.) Plaintiffs' response to Defendant's Objection was originally due November 18, 2021. Prior stipulations extended the deadline to December 1, 2021 and then December 6, 2021. (Docs. 211 and 217.) This request seeks an extension to December 15, 2021.

In support thereof, the Plaintiffs and BOFA represent as follows:

The Plaintiffs require additional time because Atty. Bernhoft, who is the lead drafter on this paper, continues to deal with his family member's post-surgical medical situation, and this has taken away from his availability to work. For this reason, the Plaintiffs require an extension of time to file their response to BOFA's objections to this Court's Rule 30(b)(6) order.

Plaintiffs' counsel contacted BOFA's counsel and discussed extending the briefing deadline. Based on those discussions, the Parties stipulate to an extended deadline for Plaintiffs to respond to BOFA's Objection to the Magistrate Judge's Order to December 15, 2021. (Doc. 200.) The Parties agree that the foregoing constitutes good cause to extend the briefing schedule deadlines.

IT IS SO STIPULATED.

Dated: December 1, 2021
THE BERNHOFT LAW FIRM, S.C.

Dated: December 1, 2021
SNELL & WILMER, L.L.P.

/s/ Daniel J. Treuden
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Attorney for Plaintiffs
Appearing *pro hac vice*

Attorneys for Bank of America, N.A.

IT IS SO ORDERED:


RICHARD E. BOULWARE, II
United States District Court

DATED this 7th day of December, 2021.

Certificate of Service

I hereby certify that on December 1, 2021, I electronically filed and served the foregoing third JOINT STIPULATION TO EXTEND DEADLINE TO RESPOND TO DEFENDANT’S OBJECTION TO MAGISTRATE JUDGE’S ORDER [ECF NO. 192] with the Clerk of the Court for the United States District Court for the District of Nevada using the CM/ECF system.

/s/ Daniel J. Treuden

Daniel J. Treuden
Attorney for Plaintiffs